

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Ernie Alfonzo Lee
Olivia Knox Lee, Debtors**

**Case No. 24-01198-JAW
CHAPTER 13**

**MOTION TO WAIVE THE REQUIREMENT TO FILE A CERTIFICATION AND
MOTION FOR ENTRY OF DISCHARGE**

COMES NOW, Olivia Knox Lee, Joint Debtor, through counsel and moves this Court to Waive the Requirement to File a Certification and Motion for Entry of Discharge as to Debtor Ernie Alfonso Lee only, and in support thereof, would show the Court as follows:

1. Debtors commenced this case on May 22, 2024 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. On or about February 21, 2025 a Suggestion of Death was filed for Debtor Ernie Alfonso Lee (dk # 63).
3. Debtor, Ernie Alfonso Lee, did not owe domestic support obligations.
4. The terms and requirements of the chapter 13 plan have been met and Ernie Alfonso Lee would otherwise be entitled to a discharge if still living.

WHEREFORE, Debtor prays for an Order to Waive the Requirement to File a Certification and Motion for Entry of Discharge as to Debtor Ernie Alfonso Lee only and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)